

YAAKOV M. ROTH
Acting Assistant Attorney General
Civil Division
DREW ENSIGN
Deputy Assistant Attorney General
SARAH L. VUONG (CA Bar 258528)
Assistant Director
WILLIAM H. WEILAND (Mass. Bar 661433)
Senior Litigation Counsel
LAUREN BRYANT (NY Bar 5321880)
ANNA DICHTER (NJ Bar 304442019)
JEFFREY HARTMAN (WA Bar 49810)
LUZ MARIA RESTREPO (NY Bar 4907077)
CATHERINE ROSS (DC Bar 9007404)
AMANDA SAYLOR (FL Bar 1031480)
ERIC SNYDERMAN (VA Bar 99563)
Trial Attorneys
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et al.*,

Defendants.

Case No. 3:25-cv-1766-EMC

**INDEX OF ADMINISTRATIVE RECORD
VENEZUELA TERMINATION**

Defendants in the above-captioned matter hereby file the Administrative Record for the Venezuela Termination.¹ The Administrative Record includes the following documents:

¹ The filing of this Administrative Record is not a concession that the decision of Secretary Kristi Noem is subject to judicial review.

Index of Administrative Record – Venezuela Termination

	<u>Document Name</u>	<u>Page(s)</u>
1.	Federal Register Notice of Termination of October 3, 2023 Designation of Venezuela for Temporary Protected Status (Feb. 5, 2025).	0001-0005
2.	USCIS Notice: Determination re Venezuela's 2023 Temporary Protected Status Designation (Feb. 1, 2025).	0006
3.	Decision Document–USCIS Notice: Extension of the 2023 Designation of Venezuela for Temporary Protected Status (Jan. 10, 2025)	0007
4.	USCIS Vacatur of 2025 Temporary Protected Status Decision for Venezuela (2025).	0008-0015
5.	Decision Document–USCIS Notice: Termination of the October 23, 2023 Designation of Venezuela for Temporary Protected Status (2025).	0016-0030
6.	<i>Matter of Dhanasar</i> , 26 I&N Dec. 884 (Dec. 27, 2016).	0031-0041
7.	El Pais: Venezuela grapples with economic collapse (Jan. 17, 2025).	0042-0050
8.	El Pais: Venezuela experiences an economic recovery in times of electoral uncertainty (Jul. 22, 2024).	0051-0062
9.	Executive Order 14150 of January 20, 2025: America First Policy Directive to the Secretary of State (Jan. 29, 2025).	0063
10.	<i>In re D-J-</i> , 23 I&N Dec. 572 (Apr. 17, 2003).	0064-0077
11.	Center for Strategic and International Studies: The Persistence of the Venezuelan Migrant and Refugee Crisis (Nov. 27, 2023).	0078-0085
12.	Congressional Research Service–Venezuela: Political Crisis and U.S. Policy (Jan. 13, 2025).	0086-0088
13.	Federal Register Notice of Designation of Venezuela for Temporary Protected Status and Implementation of Employment Authorization for Venezuelans Covered by Deferred Enforcement Departure (Mar. 9, 2021).	0089-0096
14.	Executive Order 14159 of January 20, 2025: Protecting the American People Against Invasion (Jan. 29, 2025).	0097-0102
15.	Executive Order 14157 of January 20, 2025: Designating Cartels and Other Organizations as Foreign Terrorist Organizations and Specially Designated Global Terrorists (Jan. 29, 2025).	0103-0104
16.	Federal Register Notice of Extension of Designation and Redesignation of Liberia Under Temporary Protected Status Program (Apr. 7, 1997).	0105-0107
17.	Federal Register Notice of Extension and Redesignation of Venezuela for Temporary Protected Status (Oct. 3, 2023).	0108-0117
18.	Federal Register Notice of Extension of the 2023 Designation of Venezuela for Temporary Protected Status (Jan. 17, 2025).	0118-0129
19.	Federal Register Notice of Extension of the Designation of Venezuela for Temporary Protected Status (Sept. 8, 2022).	0130-0138
20.	Federal Register Notice of Implementation of a Parole Process for Venezuelans (Oct. 19, 2022).	0139-0149
21.	Federal Register Notice of Implementation of a Parole Process for Venezuelans (Jan. 9, 2023).	0150-0153

22.	Insight Crime: Tren de Aragua (Jul. 12, 2024).	0154-0160
23.	Insight Crime: Why is Venezuela's Crime Rate Falling? (May 28, 2024).	0161-0164
24.	Inter-American Commission on Human Rights Annual Report 2023: Chapter IV.B: Venezuela (2023).	0165-0209
25.	Letter From Secretary of State Antony J. Blinken to Alejandro Mayorkas (Sept. 24, 2024).	0210-0221
26.	Letter from Secretary of State Marco Rubio to Kristi Noem (Jan. 31, 2025).	0222-0223
27.	NPR: Why Venezuela is no longer in freefall (May 8, 2024).	0224-0240
28.	Situation of human rights in the Bolivarian Republic of Venezuela – Report of the United Nations High commissioner for Human Rights (Jul. 1, 2024).	0241-0245
29.	Pan American Health Organization: Venezuela–Country Profile (Sept. 24, 2021).	0246-0252
30.	Refugee and Migrant Response Plan 2021 – For Refugees and Migrants From Venezuela (2021).	0253-0271
31.	Reuters: Venezuela inflation has cooled – but voters say they still can't make ends meet (Jul. 23, 2024).	0272-0284
32.	Federal Register Notice of Six-Month Extension of Temporary Protected Status Benefits for Orderly Transition Before Termination of Liberia's Designation for Temporary Protected Status (Sept. 26, 2016).	0285-0290
33.	Federal Register Notice of Termination of the Designation of Sierra Leone Under the Temporary Protected Status Program; Extension of Employment Authorization Documentation (Sept. 3, 2003).	0291-0294
34.	Federal Register Notice of Termination of Designation of Liberia Under Temporary Protected Status Program After Final 6-Month Extension (Mar. 31, 1998).	0295-0297
35.	Federal Register Notice of Termination of Designation of Lebanon Under Temporary Protected Status Program (Feb. 8, 1993).	0298-0300
36.	Federal Register Notice of Termination of the Designation of El Salvador for Temporary Protected Status (Jan. 18, 2018).	0301-0307
37.	Federal Register Notice of Termination of the Designation of Sudan for Temporary Protected Status (Oct. 11, 2017).	0308-0314
38.	The Cost of the Border Crisis: Testimony Before the House Budget Committee (May 8, 2024).	0315-0317
39.	The Fiscal Burden of Illegal Immigration on United States Taxpayers (2023).	0318-0408
40.	The New Humanitarian–Hunger, healthcare, and schools: Reasons to leave Venezuela (along with a Maduro poll win) (Jun. 25, 2024).	0409-0423
41.	USCIS Refugee, Asylum and International Operations STAR Research Branch: Temporary Protected Status Considerations – Bolivarian Republic of Venezuela (Aug. 2024).	0424-0454
42.	UNHCR Global Focus: Venezuela situation (2024).	0455-0457

43.	Federal Register Notice of Vacatur of 2025 Temporary Protected Status Decision for Venezuela (Feb. 3, 2025).	0458-0460
44.	Venezuelan Observatory of Violence: Annual Report (2023).	0461-0491
45.	El Pais: Venezuela calls on retired teachers to return to school amid staff shortages (Oct. 10, 2024).	0492-0500
46.	Associated Press: Major power outage hits Venezuela's capital, with Maduro government blaming 'sabotage' (Aug. 30, 2024).	0501-0505
47.	Associated Press: Tren de Aragua gang started in Venezuela's prisons and now spreads fear in the U.S. (Sep. 24, 2024).	0506-0513
48.	Associated Press: U.S. sanctions a Venezuela gang for spreading criminal activity across Latin America (Jul. 11, 2024).	0514-0520
49.	Proclamation 10886: Declaring a National Emergency at the Southern Border of the United States (Jan. 20, 2025).	0521-0523
50.	Press Statement from Marco Rubio: Priorities and Mission of the Second Trump Administration's Department of State (Jan. 22, 2025).	0524-0529

Dated: April 7, 2025

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General
Civil Division

DREW ENSIGN
Deputy Assistant Attorney General

WILLIAM H. WEILAND (Mass. Bar 661433)
Senior Litigation Counsel

ERIC SNYDERMAN (VA Bar 99563)
ANNA DICHTER (NJ Bar 304442019)
LAUREN BRYANT (NY Bar 5321880)
AMANDA SAYLOR (FL Bar 1031480)
CATHERINE ROSS (DC Bar 9007404)
LUZ MARIA RESTREPO (NY Bar 4907077)
JEFFREY HARTMAN (WSBA 49810)
Trial Attorneys

/s/ Sarah L. Vuong
SARAH L. VUONG (CA Bar 258528)
Assistant Director
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Tel: (202) 305-1263

Sarah.L.Vuong@usdoj.gov

Attorneys for the Defendants